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Docket: EPA-R06-OW-2017-0217
Proposed NPDES General Permit for New and Existing Sources and New Dischargers in the Offshore Subcategory of the Oil and Gas Extraction Category for the Western Portion of the Outer Continental Shelf of the Gulf of Mexico (GMG290000)

Comment On: EPA-R06-OW-2017-0217-0001
NPDES General Permits: New and Existing Sources and New Dischargers in Offshore Subcategory of Oil and Gas Extraction Category for Western Portion of Outer Continental Shelf of Gulf of Mexico

Document: EPA-R06-OW-2017-0217-DRAFT-0009
Comment on EPA-R06-OW-2017-0217-0001

Submitter Information

General Comment

Current Draft Permit Language with Comments listed below each.

1.
Section B: 2 a, b
Formation Oil. No discharge. Monitoring shall be performed on the drilling fluid as follows:
a) Once prior to drilling using the gas chromatography/mass spectrometry test method specified in Part I, Section D.11 of this permit. The test results shall be reported in the DMR.

Alternatively, the permittee may provide certification, as documented by the supplier(s), that the drilling fluid being used on the well will meet the no discharge limit for formation oil.
b) Once per week during drilling using the Reverse Phase Extraction test method specified in Part I, Section D.12 of this permit or the gas chromatography/ mass spectrometry method specified in Part I, Section D.11 of this permit.

Comment: Please consider clarifying the above statement by adding exact language indicating the GCMS method as that listed in Appendix 5 of 40 CFR Part 435, Subpart A, being EPA Method 1655.

2.

11. Formation Oil Contamination of Drilling Fluids
The approved test method for permit compliance is identified as: Gas chromatography/mass spectrometry (GC/MS) as described below. The GC/MS method reports results for the GC/MS test as percent crude contamination when calibrated for a specific crude oil. In order to define an applicable pass/fail limit to cover a variety of crude oils, the same crude oil used in calibration of the RPE test shall be used to calibrate the GC/MS test results to a standardized ratio of the target aromatic ION Scan 105. Based on the performance of a range of crude oils against standardized ratio, a value will be selected as a pass/fail standard which will represent detection of crude oil. 107

Comment: Please consider clarifying the above statement by adding exact language indicating the GCMS method as that listed in Appendix 5 of 40 CFR Part 435, Subpart A, being EPA 1655.

3.

Appendix C
Determination of Crude Oil Contamination in Non Aqueous Drilling Fluids by Gas Chromatography/Mass Spectrometry (GC/MS)

Comment: Appendix C currently appears to describe the original GCMS method with the NIST standard (NIST 1582 Petroleum Crude Oil Standard Reference Material) that is no longer available. The Crude Oil calibration procedure described in Appendix C is no longer a viable option as the preparation of the calibration curve is specific to the use of the NIST 1582 standard. Please consider revising-updating Appendix C to reference and describe only the GCMS method listed in Appendix 5 of 40 CFR Part 435, Subpart A, being EPA 1655, with the use of NIST 2779 Gulf of Mexico Crude Oil Standard Reference Material as the calibration standard.

4.

7.2.1 Crude Oil Reference- NIST 1582 Petroleum Crude Oil Standard Reference Material (U.S. Department of commerce national Institute of Standards and Technology, Gaithersburg, MD 20899). Alternative NIST Method 2779 can be used for the purposes. This oil will be used in the calibration procedures

Comment: Please note that NIST 2779 is a standard used for calibration in the GCMS test and not a method itself.

5.

12.2.3). If the ratio of the of the 105 EIP area to the TCB m/z 91 EIP area for the authentic sample is greater than that for the 1% formation oil equivalent calibration standard, the sample is

considered contaminated with formation oil.

Comment: For clarification, please consider revising-updating Appendix C to indicate and describe only the GCMS method listed in Appendix 5 of 40 CFR Part 435, Subpart A, being EPA 1655 but incorporate 12.2.3 listed above, to describe the limit for formation oil. As EPA 1655, like other EPA methods, describes the manner in which to perform the test, but may not indicate a permit limit for that test.

6.

10. Polynuclear Aromatic Hydrocarbons
The approved test method for permit compliance is identified as: Method 1654A: "PAH Content of Oil by High Performance Liquid Chromatography with a UV Detector," which was published in Methods for the Determination of Diesel, Mineral and Crude Oils in Offshore Oil and Gas Industry Discharges, EPA-821-R-92-008 (incorporated by reference and available from National Technical Information Service at 703/605-6000).

Comment: For additional laboratory procedure flexibility, please consider also allowing EPA SW 846 Method 8270 as a permit compliance test method for PAH determination as required in this permit.

Should EPA R6 have any questions or would like to further discuss these comments, please contact Annie Reedy or Carlyle Bourgeois with Element-Lafayette at 1-800-737-2378.